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**VIA ECF**

The Honorable Sidney Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Candie Hailey Means v. City of New York, et al.;  
Docket No. 17 CV 5374 (SHS) (KNF)

Dear Judge Stein,

As you are aware, we represent the Plaintiff, Candie Hailey Means, in the above-referenced matter. I write this letter requesting that Your Honor consider a recently decided case by the Supreme Court, Taylor v. Riojas, et al., 2020 WL 6385693 (Nov. 2, 2020), which is annexed hereto as Exhibit 1, in support of our opposition to the pending Summary Judgment motion.

Sincerely,

/s/ Derek S. Sells  
Derek S. Sells

CC: All Attorneys of Record – VIA ECF